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U S D O E - Rocky Flats Plant
EPA ID No. C07890010526

COLORADO DEPARTMENT OF HEALTH

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

HAZARDOUS WASTE INSPECTION REPORT

DATE OF INSPECTION:	May 26-29, 1987
FACILITY:	U S D O E - Rocky Flats Plant
LOCATION:	Jefferson County, Colorado
FACILITY CONTACT:	Mr. Chuck Wickland, Rockwell International Mr. John Kreuger, DOE 966-4294
NOTIFICATION:	Generator and TSD
TYPE OF INSPECTION:	Evaluation Inspection
PARTICIPANTS	John Krueger, DOE-RFAO Barry Miller, Classification Office Kirk McKinley, RCRA/CERCLA Program Chuck Wickland, Waste Management Program Bob Lerche, Rockwell-Legal Ernie Lombardi, Waste Operations John Hayden, Waste Operations Frank McMenus, Liquid Waste Processing Garvin Hewitt, Liquid Waste Process H. L. Turner, Rockwell Emergency Preparedness Gislinde Compden, General Labs, Building 881 James Kiefer, CDH Nancy Jackson, CDH Peter Bierbaum, CDH Mike Sattler, CDH
WEATHER CONDITIONS:	Sunny and warm
TIME IN:	9:00 A.M. each day
TIME OUT:	3:00 P.M. each day

The inspectors entered the facility at 9:00 a.m. on May 26, 1987, and presented their credentials to the DOE and Rockwell International representatives. The inspection had been scheduled in advance by telephone with Mr. Wickland and Mr. Krueger on May 18 and 19, 1987. After receiving a short security briefing, the inspectors told the facility representatives that the inspection would cover those areas that generate, treat, store and/or dispose of hazardous waste designated as areas 1 and 3. The inspectors also told the facility representatives that they would be reviewing the waste analysis plan and records, inspection schedules and records, training plans and records, contingency plan, closure plans, operating record, and manifests. Mr. Wickland said that Mr. Lombardi would escort the inspectors and make any arrangements necessary for the inspectors to inspect any area or review any documents. Because the inspectors did not have the appropriate security clearance, those parts of areas 1 and 3 that require a Q-clearance were not inspected.

The inspectors reviewed the following documents and records:

1. The waste analysis plan for the facility is the plan which was submitted in the part B permit application. In reviewing the plan, it appeared to address the identification and analysis of waste streams at points of generation. Compatibility of wastes for storage or treatment is addressed in broad categories where certain waste codes are identified in tables for container storage, tank storage, treatment or incineration. The plan does not address or require analysis or fingerprinting of wastes to be stored or treated. The plan does not use a means of testing for compatibility such as the compatability chart from "Law, Regulations, and Guildelines for Handling of Hazardous Waste." (California Department of Health, February 1975). Records of analysis reviewed by the inspectors were the records of initial analysis of waste streams, and some records of analysis of wastes prior to shipment off-site. There were no records of waste analysis or compatibility testing prior to wastes being stored for greater than 90 days. Facility personnel, Mr. Chuck Wickland and Mr. John Hayden said that determinations for compatibility of wastes being stored is based upon knowledge of the process and waste stream identification and analysis which has been supplied on the waste processing request form.

2. Inspection schedules and records were reviewed. These are maintained in books, one for each building with storage and for the hazardous waste storage cargo containers. Records were reviewed from buildings 331, 460, 561A, 561B, 776, 884, 964, B-991 and HWSS. The records documented the required weekly inspections.

3. The training plan and associated records were reviewed. The inspectors met with Mr. Jeff Nehr, Manager of Training Program Development, Mr. Jim Williams, Manager of Training Assessment, Mr. Jeff Mautz, Training Coordinator and Ms. Ann Ficklin, Project Administrator. The inspectors asked Ms. Ficklin to explain the training plan. She said it is as it is listed in section H of the part B application. She said that the training consists of two parts, one part for operators and foremen who handle hazardous waste or perform emergency response, and another part for middle management and design engineers of waste projects. Ms. Ficklin added that

top management personnel receive a regulatory overview. The inspectors asked how many employees had been trained. Ms. Ficklin said that approximately 3500 employees have received training. She said that about 187 people still needed training even after the make-up training held in March. Ms. Ficklin said that these employees will be scheduled and trained as soon as possible.

The inspectors asked to review the job descriptions and training records. Ms. Ficklin said that the job descriptions and job titles are listed in section H of the part B application. The training records were reviewed. These records consist of class attendance rosters, tests and on-the-job checklists. According to the records, there were 6 employees who did not pass the test with the required 67%. These employees attended another class and passed the test. The inspectors also reviewed certificates of training for Ms. Ficklin, copies of overhead slides for training, and a training class printout for the training put on by Roy F. Weston, Inc.

Ms. Ficklin explained that Roy F. Weston, Inc, was contracted to conduct the first training. Future plans are to have satellite training centers with a computerized version of a self-paced, structured training program. The system has been let for bids which are due back in June. Plans are to have training once per month for new employees. This initial training will be done by Waste Operations personnel (Ann Ficklin and Michael Hubbs). Special training sessions will be scheduled for contractors. Plans are for the computer system to send written notices to employees 60 days prior to training, and delinquency notices will be sent to supervisors. Ms. Ficklin also explained that they are developing new job safety training for certain jobs which will include RCRA training and be an integrated package so an indivdual can be certified for his job or function. This may take up to five years to develop for all radiation workers.

4. Emergency preparedness and the contingency plan were reviewed. The inspectors met with Mr. Lloyd Turner who is in charge of the plant emergency preparedness. Mr. Turner said that it is the DOE policy for the plant to be capable of dealing with all emergencies. The plant has its own fire department with several hundred employees that have been trained to assist the fire department. According to Mr. Turner the plant can provide its own response to fires, chemical and radiological and medical emergencies. He said that there are written agreements with two hospitals to provide medical care in the case that the on-site capacity is exceeded. Mr. Turner said that although there are no written agreements, the Rocky Flats Plant has coordinated its response to hazardous materials incidents with both Boulder and Jefferson County agencies. The procedure as explained by Mr. Turner is that for on-site incidents, Rocky Flats Plant personnel respond and the counties are notified, and for off-site incidents, the county responds and Rocky Flats Plant personnel will respond if requested. Mr. Turner also said that his office interfaces with DODES in the case of an incident on-site. The contingency plan was reviewed and appeared to contain the required items. The plan refers to an Emergency Director rather than an emergency coordinator, but the Emergency Director has the duties and responsibilities that are required of an emergency coordinator by the regulations. The contingency plan does not have an evacuation plan as such, but refers to evacuation plans for each building which designate evacuation signals and routes. The facility fire department had a copy of the contingency plan, but was not familiar

with its contents, and had received no training on the contingency plan according to Keith Miller, Fire Chief and Tim Parker, Training Officer of the fire department.

5. Manifests were reviewed for shipments of hazardous waste made from Rocky Flats to off-site treatment, storage, or disposal facilities. According to facility records, 47 off-site shipments of hazardous wastes have been made from Rocky Flats since November 1980. The manifests reviewed by the inspectors appeared to be properly completed and maintained. However, the inspectors noted that hazardous waste shipments made between September, 1986 and December 1986 (total of 4 shipments) were made on expired uniform hazardous waste manifest forms.

6. The operating record was reviewed.

A. In general, the Rocky Flats facility operator records consist of 4 parts:

1. Waste Processing Request Forms - This form is filled out by the on-site generator and approved by the Waste Operations group. The form lists the amount and type of waste and the on-site storage destination. These forms are also used for "manifesting" shipments of hazardous waste on the plant site.

2. Storage Area Drum Logs - These logs are maintained at each on-site storage area. The logs list each drum by number -- the number corresponds to the Waste Processing Request Form -- and give the "Date-In" and "Date-Out" of each drum.

3. Hazardous Waste Computor System Log - This log lists each drum by number and description, gives the current storage site, and lists manifest numbers for off-site shipments.

4. Manifests from off-site shipments of hazardous waste.

B. John Hayden (Waste Operations Group, Rocky Flats Plant) explained to the inspectors the general mechanics of the facility operator records system. According to Mr. Hayden, the operation record is established as follows:

1. A multipart Waste Processing Request Form is filled out by the generator of the waste. The generator specifies the amount and type of waste generated.

2. If the waste is not radioactive, the form is forwarded to the Environmental Control Section.

3. If the waste is determined to be Non-hazardous and Non-radioactive, Environmental Control gives permission for on-site landfilling of the waste. The Waste Processing Request Form stays with Environmental Control.

4. If the waste is determined to be a hazardous waste, the Forms are sent to Waste Operations. The Waste Operations group signs the form and indicates on the bottom of the form where the waste may be sent for storage on the plant site.

For the purposes of tracking, each drum of waste is given an individual number; several drums of a single waste stream from one generator are given a single number, but each drum is individually designated as ".1", ".2", etc.

Waste Operations enters the data from the form onto the Hazardous Waste Computer System Log, and files one copy of the multipart form. Two parts of the form are returned to the generator. The generator then sends the waste to the designated on-site storage unit with one copy of the form. The third copy of the form is retained by the generator.

5. When the waste is placed in one of the on-site storage areas, the number of the drum and the date the drum was placed in storage is entered on the Storage Area Drum Log.

6. Hazardous waste shipped off-site for treatment, storage or disposal is manifested using a hazardous waste manifest. Manifest numbers are entered onto the Hazardous Waste Computer Log System, and the "Date-Out" is entered on the Storage Area Drum Log.

D. The inspectors reviewed randomly selected portions of each part of the operator log and compared for accuracy the four parts of the record. The inspectors noted the following:

1. According to Mr. Hayden, no one person in the waste operations group is assigned to keep the operator record up to date. Mr. Hayden stated thate there could be as much as a one month delay in getting data entered onto the Hazardous Waste Computer System Log. Mr. Hayden further stated that the log was currently up-to-date, and complete. However, the inspectors observed that the last item entered in to the Log was drum number 87469.1 - 87469.6. The waste processing request date for these drums was 3/19/87; the waste was approved by waste operations on 3/26/87. The inspectors noted 25 waste processing request forms consisting of 83 drums which have been approved by waste operations for on-site storage, but had not been entered onto the Log. Forms not yet entered include wastes approved for storage in November and December of 1986.

2. A waste processing request form for drum 67490 was submitted to waste operations for approval on 10/20/86; radiation test results were received 10/20/86. The form shows no approval or designation for on-site storage. Additionally, the drum is not listed on the Computer Log. Mr. Hayden was unable to tell the inspectors the current status of the drum.

3. Manifest numbers for off-site shipment are not noted on waste processing forms. The only notation of the manifest number is made on the hazardous Waste Computer Log System. Therefore, cross checking between drums, on-site storage and shipment records is not possible except through the Computer Log system.

4. Drum 86184.2 was returned to Rocky Flats from a shipment to OSCO (manifest 25570 dated 3/6/87). The Computer Log printout shows storage in CC8; the CC8 storage area drum log shows a Date-In of 4/7/87. In response to the inspectors' questions regarding the status of the drum, Rocky Flats prepared a memo for the inspectors. The memo explains that the waste was returned due to the presence of 2700 ppm PCB, and states that the drum is currently stored on-site in CC8. The memo also states that the waste was returned to Rocky Flats on 3/30/87. No separate manifest was prepared for the shipment from OSCO to Rocky Flats. No explanation was given in the memo for where the waste was stored during the period from 3/30/87 and 4/7/87 when the waste was logged into CC8.

5. According to the Computer Log, drum number 87452 was put into storage at CC16 on 5/15/87; no record of such storage is noted on the storage area drum log.

6. Shipment of drum 86156 is not reflected in the "Date-Out" portion of the storage area drum log for CC2; shipment was made on manifest 87654.

7. Manifest 41096 for shipment to OSCO on 12/22/86 reflects a shipment of 780 gallons of Waste Flammable Liquid, and 650 gallons of waste Hazardous Waste Liquid. According to the Computer Log, manifest 41096 is listed for shipments totaling over 1880 gallons. In response to the inspectors comments, Rocky Flats explained the balancing problem in a memo to the inspectors dated 5/28/87.

8. There are significant differences between the office duplicate set of storage area drum logs and the storage area logs. According to Mr. Hayden, the storage area logs are correct, and the duplicate logs are maintained only for office managers.

9. The Computer Log shows storage of drums 86184.1, ,3 - .7 in CC1 prior to off-site shipment on 3/6/87. The drum log for storage area CC1 shows no record of the drums having been placed in or taken out of storage.

7. Copies of the annual report were on file and were reviewed by inspectors.

8. Ground water sampling and analysis plans and records were not reviewed as a part of this inspection.

9. Closure plans and post-closure plans were submitted with the part B application for those units to be permitted. Separate closure plans were submitted for those units which will be closed rather than permitted. These plans were not reviewed as a part of this inspection.

After reviewing the records and documents, the inspectors asked to see all points where hazardous waste is generated, stored or treated in areas 1 and 3. This inspection did not include any points in area 1 and 3 where a Q-clearance was required. Those points observed by the inspectors included the following:

1. Building 442 for Testing of HEPA filters was inspected. There were three storage areas designated with signs. Each area had drums with hazardous waste labels. Two areas were marked as satellite storage and one marked as a less-than-90 day storage. The three areas with drums were in a secured storage area in the building.

2. Building 443, the steam plant was inspected. All storage areas were marked and labeled. There were also weekly inspection logs for these storage containers. This building had five satellite storage areas and one less-than-90 day storage area. The inspectors suggested to the facility personnel that they might consider consolidating some of the satellite storage areas because some of them contain identical or very similar wastes and it would not be that difficult for an employee to walk a few more feet when placing wastes into the drums.

3. Building 334, the maintenance building was inspected. This building has three satellite storage areas outside the building by the loading docks. These three storage drums, reference nos. 338, 344 and 1084, are outside because the waste is ignitible. The inspectors noted that these three satellite storage areas were not under the control of the operator as required, nor were they secured in any way to prevent unauthorized access by a passer-by. A photograph of this satellite storage area was requested by the inspectors. Building 334 has another four satellite storage areas, reference nos. 336, 337, 342 and 443 at various generation points inside the building. All storage areas were properly labeled and marked, and there was a log book for weekly inspections.

4. Building 333, the paint shop, was inspected. There are two satellite storage areas, reference nos. 331 and 332 which are outside of the building. These areas are 55 gallon drums for the accumulation of paint thinner and paint-impregnated rags. The two satellite storage drums were secured with locking covers over the top of the drum. According to paint shop personnel, used paint strainers are put into the trash, paint filters are wetted down and bagged and the paints used do not contain chromium or lead.

5. Building 331, the garage area was inspected. Inside the building there are three satellite storage areas, reference nos. 1029, 1030 and 1031. They were marked and labeled. There is one area for each of the following wastes: waste oil from vehicles, waste Stoddards solvent, and oil-soaked rags.

6. Building 460, a non-nuclear manufacturing building, requires a Q-clearance, but the inspectors were able to look at the acid and solvent dumpsters outside the buildings. These two units, nos. 8 and 9, are considered greater-than-90 day storage units under interim status. These units are portable tanks. The area of the dumpsters is posted with signs "Danger - Unauthorized Persons - Keep Out" and "No Smoking". There is nothing indicating that the dumpsters contain hazardous waste. The solvent dumpster receives Freon and 1,1,1-trichloroethane solvent wastes. Mr. Al Church, Building Manager, showed the inspectors the evacuation plan for building 460. The plan consists of instructions and diagrams showing evacuation routes.

7. Building 440, the modification center, requires a Q-Clearance, but the inspectors were able to inspect two storage areas outside of the building. One of these areas, reference no. 430, is a satellite storage area labled as hazardous waste and as a flammable solid. The other area, reference no. 431, is a less-than-90 day storage area with five 55 gallon drums, all of which were labeled and dated.

8. Building 439, Remote Handling Building, has two satellite storage areas outside of the building, one for solvent wipes and one for waste solvent. They were properly labeled and marked as reference nos. 422 and 423.

9. Building 444, production operations, is part of area 4, but as the inspectors walked by they noticed an area outside the building with some drums. After asking to see that area, Mr. Lombardi escorted the inspectors to the area with the drums. The area was not marked or posted with any signs, but Mr. Lombardi said he thought it was a less-than-90 day storage area for building 444. There was a 55 gallon drum labeled as hazardous waste, clorothene and dated with an accumulation date of 5/8/87. There were also two 30 gallon drums of metal chips, but they were not labeled or marked.

10. Building 428, process pump station/valve vault, reference no. 40.01 was inspected. The door to the building was posted with a danger, unauthorized personnel-keep out sign. The vault contains one tank and two pumps. The tank and piping are considered part of the waste treatment system.

11. Building 788, pond crete facility and ponds were inspected. The inspectors reviewed inspection records for the daily and weekly inspections of the three ponds, the tank, the container storage area and the storage pad. The inspectors also observed the pond crete process. The pond crete and salt crete storage area, reference no. 25, is an asphalt area where the containers of salt crete and pond crete are stored on pallets and are covered with tarps. The accessibility of these containers for inspections is limited by the tarps and the arrangement of the pallets.

12. Building 964, the mixed waste storage building, was inspected. The majority of this building is used to store the containers of pond crete or salt crete. These containers are stacked two high on pallets. Each container is approximately three feet square, but there is only about two feet of aisle space between pallets which would require the movement of a large number of containers in order to access a container in bad condition. All containers were labeled and dated. On the east end of the building were drums of cemented evaporator sludge from building 374. There was a row of drums two deep with an aisle space and then a row of drums three deep against the east wall. It appeared as though it would be very difficult to inspect the drums stored along the east wall.

13. Cargo container 980, reference no. 995, is at the Swinerton and Walberg shops. According to Mr. Lombardi, this unit is currently a less-than-90 day storage, but he said they plan to update the part A to include it as an interim status storage unit. There were drums of rags and solvents. Waste rag drum 87489.1 had a date of 5/1/87 and drums 87489.2 through .4 did not have accumulation start dates. The waste solvent drum 87488 had no date.

14. Building 980, the Swinerton and Walberg shops, has a satellite storage area, reference no. 994, inside the shop. This is a drum of approximately 30 gallons for solvent-soaked rags. This drum is labeled and marked properly. When full, the contents are put into the storage drums in cargo container 980.

15. Building 130, programmatic support building, was inspected. This building has seven satellite storage areas reference nos. 327, 1025, 1026, 1027, 1028, 1032 and 1240. All areas are marked and labeled and have inspection log books.

16. Building 111, administrative offices, was inspected. There are four satellite storage areas and one less-than-90 day storage area. Reference no. 1080 is the less-than-90-day storage area with two 55 gallon drums, one for perchloroethylene and naphtha and the other for perchloroethylene-saturated rags. Reference nos. 305, 306, 308 and 1239 are properly labeled and marked. The less-than-90 day storage drums had accumulation dates.

17. Building 441, offices, was inspected and has two satellite accumulation areas, reference nos. 1241 and 1242. Both of these were properly labeled and marked, and there was an inspection log for each.

18. Building 367, pesticide storage, was inspected. Because this building is used to store new pesticide product, it is not considered a hazardous waste unit.

19. Building 551, warehouse, was inspected. There were two satellite accumulation areas. Reference no. 526 is a 30 gallon plastic drum for waste nickle cadmium and mercury batteries, and reference no. 1093 is a ten gallon flammable materials container for oily rags containing coolant and solvent. These areas were properly marked and labeled, and inspection records were maintained.

20. Building 549, Telecommunications and Alarm Support, was inspected. This building has two satellite storage areas, both which are outside the building, reference nos. 525 and 1265, one on each end of the building. Both are used to accumulate wipes containing isopropyl alcohol or cleaning solvents. Again, this situation brings up the question of whether or not these drums are under the control of the operator. In addition, it seems that only one satellite accumulation area might be necessary if it were centrally located for this building. These two areas were labeled and marked properly.

21. Building 750A, part of a trailer complex used by Alarm Support, was inspected. There was one satellite accumulation area, reference no. 1266, to accumulate wipes containing solvent. This drum was properly labeled and marked.

22. Building 331, cargo container storage for garage, reference no. 2, was inspected. This cargo container, like the others used to store hazardous waste, is equipped with a containment plan and rollers which keep the drums up off the floor. This cargo container had seven drums of waste oil and one drum of waste ethylene glycol. There was also a spill kit which contained protective clothing, a respirator and bags of absorbent.

23. HWSS Cargo Containers, reference no. 1, were inspected. Cargo containers 1 through 11 were located out by the landfill, but cargo containers 12, 13 and 16 had been relocated to the parking lot at building 750. Some of the cargo containers are 20 feet long and will hold about 18 drums, and some cargo containers are 40 feet long and will hold about 38 to 40 drums. Each cargo container was equipped with a containment pan and rollers upon which the drums were placed. The drums appeared to be in good condition and were labeled as required. There was a log book for each container showing when wastes were received or removed. A photograph of the cargo containers was requested. Mr. Lombardi said the cargo containers were being moved to the new location because of the past difficulties encountered in trying to access the cargo containers in the winter when the roads are icy and muddy. It is important to note here that the part A permit application has never been updated to request this change in location for the cargo containers. The interim status regulations also require Department approval before this change can be made.

24. Building 995, sewage treatment facility, was visited. This area may not fall within regulation as a hazardous waste management unit.

25. On May 29, 1987, Mike Sattler requested to see the three spray fields and the landfill area because he was reviewing the closure plans for these areas. In addition, the inspectors were shown the P.U. and D (property utilization and disposal) area. This area contained a large number of drums, but facility personnel told the inspectors that these drums were empty and would be sold or salvaged.

26. On May 28, 1987, Peter Bierbaum accompanied Jim Kiefer on an inspection of the Rocky Flats facility. The comments provided below are related to the permitting of treatment and storage activites. These comments point out areas which are not acceptable under a hazardous waste permit and must be corrected prior to issuance of a permit. The units for which a permit is requested which were inspected on May 28th are Unit 8 (Acid Dumpster), Unit 9 (Solvent Dumpster), Unit 40.01 (Valve Vault), Unit 25 (Pond Crete/Salt Crete Storage), Unit 21 Pond Crete Treatment, Unit 24 (Salt Crete Storage) and Unit 1 (Main Hazardous Waste Container Storage). The following observations and comments result from this inspection.

A. Unit 8 and 9 (Dumpster storage outside building 460) - The secondary containment capacity did not appear adequate to hold the contents of a full dumpster. Also, the secondary containment capacity did not provide for easy removal of precipitation. Secondary containment must be of sufficient capacity to contain the volume of a full dumpster plus any precipitation. Alternatively the facility may install protection against precipitation.

B. Unit 40.01 (Valve Vault) - Under the new tank regulations a vault used as secondary containment for a hazardous waste tank must be sealed to prevent migration of wastes into the concrete. All joints must also be sealed to prevent release. The concrete in the vault did not appear to be sealed.

C. Unit 25 (Pond Crete/Salt Crete Storage) - Crates of Pond Crete and Salt Crete are stored on an asphalt area under tarps. Because of the crate arrangement, not all of the containers appear to be inspectable even if the tarped area is entered. In addition, the tarpaulin covers have a projected lifetime of only three years.

D. Unit 24 (Salt Crete Storage) - Unit 24 is a corrugated metal warehouse used for storage of salt crete boxes. The storage arrangement create a potential problem from the operators' standpoint. The boxes, which are about 3 1/2 feet wide, are stored with aisles only 2' to 2-1/2' wide. If a box ruptured, numerous other boxes would have to be removed before reaching the damaged box. Since all the waste stored is in solid form, no imminent danger would exist. However, the removal of a damaged box would create an operational problem.

E. Unit 1 (Main Hazardous Waste Container Storage) - This area at the parking lot for building 750 consisted of three cargo containers for liquid wastes and a roped-off outside asphalt storage area for containers without free liquids. At the time of inspection of the asphalt area, several of the containers were in direct contact with the ground (no pallets or drumholders). Also, the area did not have a means of controlling precipitation which may need to be analyzed.

Liquid storage containers were documented in the operating record; however, neither the operating record nor the storage area showed any evidence of identification and separation of incompatibles. In fact, one possible incompatible storage problem was observed. A drum of dilute picric acid was stored in the same area as solvent containers.

Lastly, this container storage area was not identified in the 1985 Part A application and consequently has not been granted interim status.

Summary of Findings

1. The waste analysis plan does not adequately provide for an analysisof waste which will provide all the information which must be known to treat, store, or dispose of the waste. Specifically, during this inspection, it was noted that the waste analysis plan does not require adequate testing and determinations for compatibility of wastes prior to being placed into storage for greater than 90 days. In addition, there were no records of waste analysis of wastes before they were placed in greater than 90 day storage.

2. The training of all personnel who required training was not completed by November 28, 1986 as required. Approximately 187 persons had not been trained at the time of this inspection.

3. The facility fire department had not been trained on the facility's contingency plan.

4. The Hazardous Waste Operator's Log is not sufficiently current to track the quantity and location of hazardous waste at the facility.

5. Significant discrepancies exist between the various parts of the facility operator records.

6. Shipments of hazardous wastes were made during the period of September, 1986 to December, 1986 using expired uniform hazardous waste manifests.

7. Satellite storage areas outside of buildings 334, 439, 440, 549, and 750A did not appear to be under the control of the process operator as required.

8. Two unmarked 30 gallon drums of metal chips (possibly hazardous waste) were stored next fo a drum of hazardous waste outside of building 444.

9. The pond crete and salt crete storage area, reference no. 25, has limited accessibility to the containers for required inspections.

10. In building 964, drums of cemented evaporator sludge are stored in a row three deep, next to the wall. This arrangement does not provide sufficient aisle space to inspect the drums, or to move emergency equipment through them if it were necessary. In addition, this building also stores containers of pond crete with limited aisle space which would require the movement of a large number of containers to provide access to a container in poor condition.

11. Drums 87488, 87489.2,87489.3 and 87489.4 stored in the cargo container at building 980 (reference no. 995) did not have accumulation start dates marked on them.

12. Cargo containers (reference no. 1) for storing hazardous waste had been moved from the landfill area to the parking lot at building 750 without the facility requesting and receiving approval of a change in the facility's part A permit application.

Prepared and reviewed by:

James Kiefer 9-9-87 Date

Nandy Jackson 9/14/87 Date

Peter Bierbaum 9/10/87 Date

Mike Sattler 9/10/87 Date

Attachments:

1. Notice of Inspection
2. RCRA Haz. Waste Tng. Program Summary, Crs. No.23-435
3. RCRA Haz. Waste Tng. Checklist, Crs. No. 18-442
4. Copy of Participant Evaluation Questionaire
5. Copy of Waste Minimization Training Packet
6. RCRA Training Exam, Crs. No. 23-435
7. Copies of Five Training Certificates for Ann Ficklin
8. Copies of Overhead Slides for Training
9. Copy Training Class Printout (Weston)
10. Handwritten List of Permitted Units
11. Haz. Waste Log Printout, Dated 5-22-87
12. Copy of Manifest Log and Manifests (7/20/81-4/6/87)
13. Copy of Printout SWMUS.DBF, Dated 5-21-87
14. Hand Written Report by John Hayden - Report of Material Balance, Manifest No. 41096
15. Hand Written History of Waste Drum Returned By OSCO
16. Copies of Waste Analysis, Nos. E86-3424, M85-2646 E87-3495, E86-3368, and M85-2572
17. Draft Copy of Procedure No. DI-668, Waste Transfer Data Base
18. 4 Photographs (supplied by Rockwell International)
    a. Photo of Storage Area in Builing 442
    b. Photo of Satellite Storage Area nos. 334-344 and 334-1084
    c. Photo of Cargo Containers
    d. Photo of Inside of Cargo Container

WASTE MANAGEMENT DIVISION
4210 EAST 11TH AVENUE DENVER, COLORADO 80220

NOTICE OF INSPECTION

Date	Inspector	Hour	
May 26-29, 1987	[illegible]	In: 9:00 am / Out: [illegible]	

Facility Name: ROCKY FLATS PLANT

EPA I.D. # CO7890010526

Telephone # 966-[illegible]

Street

City	State	Zip

Facility Representative(s)	Title
[illegible]	CHIEF ENGINEER, SR. [illegible]

Entered by Consent (X) Warrant ( )

Inspection Arranged Prior to Inspection (X) YES ( ) NO

Initial Evaluation Date

Inspection Type

Generator	(X)	G
Transporter	( )	T
Land Disposal TSDF	( )	L
Non-Land Disposal TSDF	(X)	F
Non-Notifier	( )	N

Evaluation Type

Evaluation Inspection	(X)	1
Sampling Inspection	( )	2
Record Review	( )	3
Ground Water Monitoring	( )	4
Enforcement Followup	( )	5
Citizen Complaint	( )	6
Part B Call-In	( )	7
Withdrawal Candidate	( )	8
Closed Facility	( )	9
Violation Determination	( )	10

Samples, Documents, Plans, and / or Photos Collected	Date To Lab
1. [illegible] CGS No. 53-435	N/A
2. [illegible] HAZ WASTE TNG CHECKLIST CRS NO. 78-442	[illegible]
3. [illegible]	|
4. [illegible]	↓

Samples requested and received by facility: ( ) YES ( ) NO

If YES: ( ) Duplicate ( ) Split N/A

Area(s) of Evaluation

Ground Water Monitoring	( )
Closure / Post Closure	(X)
Financial Responsibility	( )
Part B	(X)
Compliance Schedule	(X)
Manifest	(X)
Other ______	(X)

INSPECTION WILL BE CONCLUDED [illegible] WEEK OF 1-5 JUNE 1987.
[signature]

Comments

DOCUMENTS COLLECTED CONTINUED:
5) RCRA TNG EXAM CGS NO. 53-435
6) COPIES OF [illegible] CERTIFICATES FOR [illegible]
7) COPIES OF OVERHEAD SLIDES FOR TRAINING
8) COPY OF TRAINING CLASS PRINTOUT ([illegible])
9) HAND WRITTEN LIST OF PERMITTED UNITS
10) HAZ. WASTE LOG PRINTOUT DATED [illegible]
11) COPY OF [illegible] REPORT [illegible]
12) COPY OF MANIFEST [illegible] AND MANIFESTS [illegible]
13) COPY OF SWMUS DBF printout 5-21 87.
14) 5-26-87 HAND WRITTEN RECEIPT OF [illegible] MANIFEST # 41096 BY JOHN [illegible]
15) COPIES OF WASTE ANALYSIS PROVIDED BY JOHN [illegible]
16) HAND WRITTEN HISTORY OF WASTE DRUM [illegible]
17) COPY OF [illegible] # DT-468 WASTE [illegible]

The facts established by this inspection will be reviewed by State personnel. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Responsible Agency State (X) EPA ( ) Oversight ( ) Joint ( )

Receipt of this Notice of Inspection Form is Acknowledged

[signature]

Signature of Facility Representative

Lead Inspector [signature]

Assisting Inspector(s)